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COLE SCHOTZ P.C.

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Justin R. Alberto (admitted pro hac vice)

Efficiency Counsel to the Official Committee of Unsecured Creditors of Purdue Pharma L.P., et al.

UNITED STATES BANKRUPTCY COURT

SOUTHERN DISTRICT OF NEW YORK

		:	
In re:		:	Chapter 11
		:	
PURDUE PHARMA L.P., et al.,		:	Case No. 19-23649 (RDD)
	1	:	
	Debtors. ¹	:	(Jointly Administered)
		:	

THIRTEENTH MONTHLY FEE STATEMENT OF COLE SCHOTZ P.C. FOR COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES AS CO-COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR THE PERIOD FROM MARCH 1, 2021 THROUGH MARCH 31, 2021

¹ The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Applicant	Cole Schotz P.C.
Name of Client	Official Committee of Unsecured Creditors
Petition Date	September 15, 2019
Date of Order Approving Employment	April 22, 2020 (nunc pro tunc to February 24, 2020)
Time Period Covered	March 1, 2021 – March 31, 2021
Total Fees Incurred	\$55,160.50
20% Holdback	\$11,032.10
Total Fees Less 20% Holdback	\$44,128.40
Total Expenses Incurred	\$157.75
Total Fees and Expenses Requested	\$55,318.25

Cole Schotz P.C. ("Cole Schotz"), in its capacity as efficiency counsel to the Official Committee of Unsecured Creditors (the "Committee") of Purdue Pharma, L.P. and its affiliated debtors and debtors in possession (collectively, the "Debtors"), hereby submits this statement of fees and disbursements (the "Thirteenth Monthly Fee Statement") covering the period from March 1, 2021 through and including March 31, 2021 (the "Compensation Period") in accordance with the Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals (the "Interim Compensation Order") [D.I. 529]. By this Thirteenth Monthly Fee Statement, Cole Schotz requests (a) interim allowance and payment of compensation in the amount of \$55,160.50 for fees on account of reasonable and necessary professional services rendered to the Committee by Cole Schotz and (b) reimbursement of actual and necessary costs and expenses in the amount of \$157.75 incurred by Cole Schotz during the Compensation Period.

FEES FOR SERVICES RENDERED DURING THE COMPENSATION PERIOD

1. **Exhibit A** sets forth a timekeeper summary that includes the respective names, positions, department, bar admissions, hourly billing rates and aggregate hours spent by each Cole Schotz professional and paraprofessional that provided services to the Committee during the

Compensation Period. The rates charged by Cole Schotz for services rendered to the Committee are the same rates that Cole Schotz charges generally for professional services rendered to its non-bankruptcy clients.

- 2. **Exhibit B** sets forth a task code summary that includes the aggregate hours per task code spent by Cole Schotz professionals and paraprofessionals in rendering services to the Committee during the Compensation Period.
- 3. <u>Exhibit C</u> sets forth a complete itemization of tasks performed by Cole Schotz professionals and paraprofessionals that provided services to the Committee during the Compensation Period.

EXPENSES INCURRED DURING THE COMPENSATION PERIOD

- 4. **Exhibit D** sets forth a disbursement summary that includes the aggregate expenses, organized by general disbursement categories, incurred by Cole Schotz in connection with services rendered to the Committee during the Compensation Period.
- 5. **Exhibit E** sets forth a complete itemization of disbursements incurred by Cole Schotz in connection with services rendered to the Committee during the Compensation Period.

NOTICE OF OBJECTION PROCEDURES

6. Notice of this Thirteenth Monthly Fee Statement will be given to (i) Purdue Pharma L.P., 201 Tresser Blvd, Stamford, CT 06901, Attn: Jon Lowne (Jon.Lowne@pharma.com); (ii) counsel to the Debtors, Davis Polk & Wardwell LLP, 450 Lexington Avenue, New York, New York 10017, Attn.: Christopher Robertson (christopher.robertson@davispolk.com) and Dylan Consla (dylan.consla@davispolk.com); (iii) the Office of the United States Trustee, U.S. Federal Office Building, 201 Varick Street, Suite 1006, New York, New York 10014, Attn: Paul K. Schwartzberg@usdoj.gov); and (iv) the independent fee examiner appointed

in these chapter 11 cases, David M. Klauder, Esq., Bielli & Klauder, LLC, 1204 N. King Street, Wilmington, Delaware, 19801 (dklauder@bk-legal.com) (collectively, the "Notice Parties").

- 7. Objections to this Thirteenth Monthly Fee Statement, if any, must be filed with the Court and served upon the Notice Parties and undersigned counsel to the Committee so as to be received by no later than June 18, 2021 at 12:00 p.m. (ET) (the "Objection Deadline"), setting forth the nature of the objection and the amount of fees or expenses at issue.
- 8. If no objections to this Thirteenth Monthly Fee Statement are filed and served as set forth above, the Debtors shall promptly pay eighty percent (80%) of the fees and one hundred percent (100%) of the expenses identified herein.
- 9. If an objection to this Thirteenth Monthly Fee Statement is received on or before the Objection Deadline, the Debtors shall withhold payment of that portion of this Thirteenth Monthly Fee Statement to which the objection is directed and promptly pay the remainder of the fees and disbursements in the percentages set forth above. To the extent such an objection is not resolved, it shall be preserved and scheduled for consideration at the next interim fee application hearing to be heard by the Court.

Dated: June 4, 2021 New York, New York

AKIN GUMP STRAUSS HAUER & FELD LLP

/s/ Arik Preis

Ira Dizengoff Arik Preis Mitchell Hurley Sara Brauner One Bryant Park

New York, New York 10036 Telephone: (212) 872-1000 Facsimile: (212) 872-1002

- and -

COLE SCHOTZ P.C.

Justin R. Alberto (No. 5126) 500 Delaware Avenue, Suite 1410 Wilmington, Delaware 19801 Telephone: (302) 652-3131 Facsimile: (302) 652-3117 jalberto@coleschotz.com

Co-Counsel to the Official Committee of Unsecured Creditors of Purdue Pharma L.P., et al.

EXHIBIT A

Timekeeper Summary

Name of Professional Person	Date of Bar Admission	Position with the Applicant and Number of Years in that Position	Hourly Billing Rate	Total Billed Hours	Total Compensation
Justin R. Alberto	2008	Member (Bankruptcy) (since 2020)	\$645.00	14.4	\$9,288.00
Jason R. Melzer	2003	Member (Litigation) (since 2009)	\$655.00	6.3	\$4,126.50
Lauren M. Manduke	2009	Member (Litigation) (since 2017)	\$520.00	18.2	\$9,464.00
Patrick J. Reilley	2003	Member (Bankruptcy) (since 2011)	\$640.00	6.6	\$4,224.00
Warren Usatine	1995	Member (Bankruptcy) (since 2004)	\$825.00	12.6	\$10,395.00
Susan Usatine	1998	Member (Litigation) (since 2006)	\$635.00	1.6	\$1,016.00
Donald A. Ottaunick	1984	Member (Litigation) (since 2000)	\$735.00	0.6	\$441.00
Michael C. Klauder	2014	Member (Litigation) (since 2021)	\$430.00	4.9	\$2,107.00
Anthony De Leo	2013	Associate (Bankruptcy) (since 2020)	\$575.00	6.6	\$3,795.00
Larry Morton	N/A	Paralegal (Bankruptcy) (since 2020)	\$315.00	27.2	\$8,568.00
Anastasia Bellisari	N/A	Paralegal (Environmental) (since 2019)	\$280.00	6.2	\$1,736.00
	TOTA	AL		105.2	\$55,160.50

EXHIBIT B

COMPENSATION BY PROJECT CATEGORY MARCH 1, 2021 THROUGH MARCH 31, 2021

Project Category	Total Hours	Total Fees
Case Administration	1.5	\$472.50
Committee Matters and Creditor Meetings	9.8	\$6,290.00
Creditor Inquiries	0.9	\$580.50
Document Review/Committee Investigation	27.9	\$13,540.50
Litigation/Gen. (Except Automatic Stay Relief)	37.5	\$24,001.00
Fee Application Matters/Objections	24.4	\$8,379.00
Preparation for and Attendance at Hearings	2.5	\$1,447.50
Reorganization Plan	0.7	\$449.50
TOTAL	105.2	\$55,160.50

EXHIBIT C

Invoice

Cole Schotz P.C.

500 Delaware Avenue Suite 1410 Wilmington, DE 19801

FEDERAL ID# 22-2113414

New Jersey — New York — Maryland — Texas — Florida

PURDUE PHARM, L.P. N/A - FEE APPLICATION ONLY

Re: OFFIC	CIAL COMMITTE	Invoice Date: Invoice Numbe Matter Numbe		April 7, 2021 887023 60810-0001	
FOR PROFE	SSIONAL SERVI	CES THROUGH MARCH 31, 2021			
CASE ADM	IINISTRATION	ı		1.50	472.50
DATE	<u>INITIALS</u>	<u>Description</u>		HOURS	AMOUNT
03/22/21	LSM	REGISTER AND ARRANGE TELEPHONIC APPEAR	ANCES	1.00	315.00
03/24/21	LSM	PROCESS FILING FEES FOR TELEPHONIC APPEA J. ALBERTO, W. USATINE, A. DE LEO AND M. KL		0.50	157.50
соммітт	EE MATTERS A	ND CREDITOR MEETINGS		9.80	6,290.00
DATE	<u>INITIALS</u>	<u>Description</u>		HOURS	AMOUNT
03/01/21	PJR	PARTICIPATE IN COMMITTEE CALL WITH COMM MEMBERS AND PROFESSIONALS RE: CASE STAT ISSUES		0.40	256.00
03/01/21	PJR	REVIEW EMAILS FROM A. PREIS AND COMMITT IN ADVANCE OF COMMITTEE CALL RE: CASE ST		0.30	192.00
03/01/21	JRA	PARTICIPATE IN UCC UPDATE CALL WITH A. PR ATKINSON, L. SZLEZINGER AND UCC MEMBERS	EIS, M.	0.40	258.00
03/04/21	JRA	PARTICIPATE IN UCC UPDATE CALL WITH A. PR ATKINSON, L. SZLEZINGER AND UCC MEMBERS	EIS, M.	0.70	451.50
03/04/21	PJR	PARTICIPATE IN COMMITTEE CALL WITH COMM MEMBERS AND PROFESSIONALS RE: CASE STAT ISSUES		0.70	448.00
03/04/21	PJR	REVIEW EMAIL FROM A. PREIS AND RELATED C MATERIALS IN ADVANCE OF COMMITTEE CALL	OMMITTEE	0.20	128.00
03/08/21	JRA	PARTICIPATE (PARTIAL) IN UCC UPDATE CALL \ AND UCC MEMBERS	WITH A. PREIS	0.50	322.50
03/08/21	PJR	PARTICIPATE IN COMMITTEE CALL WITH MEMB PROFESSIONALS RE: CASE STATUS AND OPEN I		0.60	384.00
03/08/21	PJR	REVIEW EMAILS FROM A. PREIS AND COMMITTING ADVANCE OF COMMITTEE CALL	EE MATERIALS	0.30	192.00
03/11/21	PJR	REVIEW EMAIL FROM A. PREIS AND RELATED D ADVANCE OF COMMITTEE	OCUMENTS IN	0.40	256.00
03/11/21	PJR	PARTICIPATE IN COMMITTEE CALL WITH MEMB PROFESSIONALS RE: CASE STATUS AND OPEN I	_	0.50	320.00
03/12/21	JRA	REVIEW A. PREIS UCC UPDATE		0.20	129.00

Re: OFFICIAL COMMITTEE OF UNSECURED CREDITORS

Client/Matter No. 60810-0001

Invoice Number 887023 April 7, 2021

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•				r age 2
DATE	<u>INITIALS</u>	<u>Description</u>	HOURS	AMOUNT
03/15/21	PJR	PARTICIPATE IN COMMITTEE CALL WITH MEMBERS AND COMMITTEE PROFESSIONALS RE: CASE STATUS AND OPEN ISSUES	0.30	192.00
03/15/21	PJR	REVIEW EMAIL FROM A. PREIS AND COMMITTEE MATERIALS IN ADVANCE OF COMMITTEE CALL	0.30	192.00
03/15/21	JRA	PARTICIPATE IN UCC UPDATE CALL WITH A. PREIS, M. ATKINSON AND UCC MEMBERS	0.30	193.50
03/18/21	JRA	REVIEW UCC UPDATE MATERIALS	0.30	193.50
03/18/21	PJR	PARTICIPATE IN CALL WITH COMMITTEE MEMBERS AND PROFESSIONALS RE: CASE STATUS AND OPEN ISSUES	1.10	704.00
03/20/21	JRA	REVIEW A. PREIS UCC UPDATE	0.20	129.00
03/22/21	JRA	EMAILS WITH A. PREIS RE AGENDA FOR TODAY'S UCC UPDATE CALL	0.10	64.50
03/22/21	JRA	PARTICIPATE IN UCC UPDATE CALL WITH A. PREIS, M. ATKINSON, L. SZLEZINGER AND UCC MEMBERS	0.30	193.50
03/22/21	PJR	PARTICIPATE ON COMMITTEE CALL WITH MEMBERS AND COMMITTEE PROFESSIONALS RE: CASE STATUS AND OPEN ISSUES	0.40	256.00
03/24/21	PJR	REVIEW EMAIL FROM A. PREIS RE: CASE STATUS AND OPEN ISSUES	0.10	64.00
03/25/21	JRA	PARTICIPATE IN UCC UPDATE CALL WITH A. PREIS, L. SZLEZINGER AND UCC MEMBERS	0.40	258.00
03/25/21	PJR	PARTICIPATE ON CALL WITH COMMITTEE MEMBERS AND PROFESSIONALS RE: CASE STATUS AND OPEN ISSUES	0.40	256.00
03/25/21	PJR	REVIEW EMAILS FROM A. PREIS RE: COMMITTEE UPDATE, HEARING ISSUES AND CASE STATUS	0.20	128.00
03/29/21	JRA	EMAILS WITH A. PREIS AND OCC MEMBERS RE TODAY'S CALL AND SACKLER UPDATE	0.20	129.00
CREDITO	R INQUIRIES		0.90	580.50
DATE	<u>INITIALS</u>	<u>Description</u>	HOURS	<u>AMOUNT</u>
03/27/21	JRA	RETURN CREDITOR INQUIRY RE PLAN FILING	0.50	322.50
03/29/21	JRA	RESPOND TO CREDITOR INQUIRY RE PLAN AND CLAIMS STATUS	0.20	129.00
03/29/21	JRA	ADDITIONAL T/C WITH CREDITOR RE CLAIM FILING	0.20	129.00
DOCUMEN	NT REVIEW/CO	DMMITEE INVESTIGATION	27.90	13,540.50
DATE	<u>INITIALS</u>	<u>Description</u>	HOURS	<u>AMOUNT</u>
03/01/21	APB	PREPARE RELATIVITY SEARCHES RE: COLE SCHOTZ TEAM AND BATCH REVIEWS	1.20	336.00
03/02/21	APB	PREPARE RELATIVITY SEARCHES RE: COLE SCHOTZ TEAM AND BATCH REVIEWS	1.30	364.00
03/02/21	LYM	CALL WITH S. USATINE AND J.MELZER RE: CLOSEOUT OF DOCUMENTS TAGGED 'HIGH' BUT NOT "HOT"	0.50	260.00

OFFICIAL COMMITTEE OF UNSECURED CREDITORS Re:

Client/Matter No. 60810-0001

DATE	INITIALS	Description	HOURS	AMOUNT
03/03/21	APB	PREPARE RELATIVITY SEARCHES RE: COLE SCHOTZ TEAM AND BATCH REVIEWS	1.00	280.00
03/04/21	APB	PREPARE RELATIVITY SEARCHES RE: COLE SCHOTZ TEAM AND BATCH REVIEWS	1.10	308.00
03/05/21	APB	PREPARE RELATIVITY SEARCHES RE: COLE SCHOTZ TEAM AND BATCH REVIEWS	1.30	364.00
03/06/21	LYM	SECOND LEVEL REVIEW OF HOT DOCUMENTS AND "CATCHALL 2021" DOCUMENTS	2.80	1,456.00
03/07/21	DAO	REVIEW DOCUMENTS	0.60	441.00
03/07/21	LYM	SECOND LEVEL REVIEW OF HOT DOCUMENTS	3.10	1,612.00
03/08/21	LYM	SECOND LEVEL REVIEW OF HOT DOCUMENTS	3.80	1,976.00
03/09/21	LYM	CONTINUE REVIEW OF "HIGH" BUT NOT "HOT" DOCUMENTS	1.20	624.00
03/10/21	LYM	SECOND LEVEL REVIEW OF DOCUMENTS TAGGED "HIGH" BUT NOT "HOT"	1.60	832.00
03/11/21	JRM	ATTEND UCC CALL.	0.70	458.50
03/12/21	APB	REVIEW STATUS OF ADDITIONAL BATCHES ON RELATIVITY	0.30	84.00
03/15/21	LYM	SECOND LEVEL REVIEW OF HOT DOCUMENTS	1.30	676.00
03/16/21	LYM	SECOND LEVEL REVIEW OF HOT DOCUMENTS	0.90	468.00
03/18/21	LYM	SECOND LEVEL REVIEW OF HOT DOCUMENTS	0.90	468.00
03/21/21	LYM	SECOND LEVEL REVIEW OF HOT DOCUMENTS	0.80	416.00
03/23/21	JRM	WORK ON REPORTING FOR UCC'S ANALYSIS OF PLAN TREATMENT.	1.50	982.50
03/24/21	JRM	WORK ON REPORTING FOR UCC'S ANALYSIS OF PLAN TREATMENT.	0.70	458.50
03/31/21	LYM	SECOND LEVEL REVIEW OF HOT DOCUMENTS	1.30	676.00
FEE APPLI	CATION MAT	TERS/OBJECTIONS	24.40	8,379.00
DATE	<u>INITIALS</u>	<u>Description</u>	HOURS	AMOUNT
03/02/21	LSM	REVIEW INVOICE AND EDIT FOR JANUARY 2021 MONTHLY FEE APPLICATION	0.50	157.50
03/03/21	LSM	EMAILS WITH J. ALBERTO REGARDING JANUARY 2021 MONTHLY FEE APPLICATION AND SECOND INTERIM FEE APPLICATION	0.30	94.50
03/04/21	LSM	DRAFT THIRD INTERIM FEE APPLICATION FOR COLE SCHOTZ	1.70	535.50
03/04/21	JRA	EMAILS WITH E. LISCOVICZ AND LM RE FEE APPS	0.30	193.50
03/04/21	LSM	REVIEW AND REVISE JANUARY MONTHLY FEE APPLICATION FOR COLE SCHOTZ REGARDING JANUARY, 2021 FEES/EXPENSES AND FORWARD SAME TO CO-COUNSEL	0.60	189.00
03/05/21	LSM	COMPILE AND REVIEW FOUR MONTHLY FEE APPLICATION FOR THIRD INTERIM FEE APPLICATION DRAFT	0.70	220.50
03/05/21	LSM	CONTINUE DRAFT OF THIRD INTERIM FEE APPLICATION FOR COLE SCHOTZ	1.30	409.50
03/07/21	JRA	REVISE FEBRUARY FEE APP	0.60	387.00

Re: OFFICIAL COMMITTEE OF UNSECURED CREDITORS

Client/Matter No. 60810-0001

DATE	<u>INITIALS</u>	Description	HOURS	<u>AMOUNT</u>
03/08/21	LSM	REVISE FEBRUARY FEE APP	0.50	157.50
03/08/21	LSM	CONTINUE DRAFT OF THIRD INTERIM FEE APPLICATION FOR COLE SCHOTZ	3.70	1,165.50
03/09/21	LSM	CONTINUE DRAFT OF THIRD INTERIM FEE APPLICATION FOR COLE SCHOTZ	1.30	409.50
03/10/21	LSM	CONTINUE DRAFT THIRD INTERIM FEE APPLICATION FOR COLE SCHOTZ	1.50	472.50
03/11/21	LSM	COMPLETE DRAFT OF THIRD INTERIM FEE APPLICATION AND FORWARD TO J. ALBERTO WITH COMMENTS	3.10	976.50
03/13/21	JRA	EMAILS WITH FEE EXAMINER AND LM RE 11TH FEE APP	0.20	129.00
03/15/21	JRA	REVISE DRAFT THIRD INTERIM FEE APP	1.00	645.00
03/25/21	LSM	UPDATE INTERIM FEE APPLICATION TEMPLATE PER CO-COUNSEL COMMENTS AND SUGGESTIONS.	0.60	189.00
03/25/21	LSM	DRAFT TWELFTH MONTHLY FEE APPLICATION FOR COLE SCHOTZ FEES/EXPENSES FOR FEBRUARY 2021	2.80	882.00
03/26/21	LSM	CONTINUE DRAFT OF TWELFTH MONTHLY FEE APPLICATION FOR COLE SCHOTZ	0.90	283.50
03/29/21	LSM	CONTINUE DRAFT OF TWELFTH MONTHLY FEE APPLICATION FOR COLE SCHOTZ	0.90	283.50
03/30/21	LSM	COMPLETE DRAFT OF COLE SCHOTZ TWELFTH MONTHLY FEE APPLICATION AND FORWARD SAME TO J. ALBERTO	1.90	598.50
LITIGATIO	ON/ GEN. (EX	CEPT AUTOMATIC STAY RELIEF)	37.50	24,001.00
<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	HOURS	<u>AMOUNT</u>
03/01/21	WU	REVIEW AND RESPOND TO MULTIPLE EMAILS RE: SCHEDULING/BRIEFING	0.20	165.00
03/02/21	WU	CALL WITH PLAINTIFF SIDE COUNSEL RE: COMMUNICATION WITH COURT RE: 3/24 CONFERENCE	0.20	165.00
03/02/21	WU	REVIEW ZURICH MATERIALS AND 2006 AGREEMENT RE: RELEASE PROVISIONS AND EMAILS RE: SAME	0.40	330.00
03/02/21	WU	REVIEW AND RESPOND TO EMAILS RE: COMMUNICATION WITH COURT RE: 3/24 CONFERENCE	0.20	165.00
03/02/21	JRA	FURTHER EMAILS WITH P. BREENE, A. PREIS, W. USATINE AND INSURERS RE STATUS CONFERENCE	0.40	258.00
03/02/21	JRA	EMAILS WITH R. SHORE AND W. USATINE RE PRETRIAL CONFERENCE	0.20	129.00
03/03/21	JRA	EMAILS WITH P. BREENE, A. KRAMER AND W. USATINE RE SCHEDULING	0.30	193.50
03/03/21	WU	REVIEW AND RESPOND TO EMAILS RE: MOTION SCHEDULING AND BRIEFING	0.20	165.00
03/04/21	ADL	EMAILS RE: SCHEDULING ORDER IN INSURANCE ADVERSARY (.1); EMAIL SUPPORT STAFF RE: NOTICE OF APPEARANCE (.2); REVISE NOTICE OF APPEARANCE (.3)	0.60	345.00

19-23649-shl Doc 2995 Filed 06/04/21 Entered 06/04/21 19:13:18 Main Document COLESCHOTZ P.C.

OFFICIAL COMMITTEE OF UNSECURED CREDITORS Re:

Client/Matter No. 60810-0001

DATE	INITIALS	Description	HOURS	AMOUNT
03/04/21	LSM	REVIEW ADVERSARY DOCKET AND DRAFT NOTICE OF APPEARANCE REGARDING ADVERSARY CASE	0.50	157.50
03/04/21	JRA	EMAILS WITH A. PREIS, S. BRAUNER AND UCC MEMBERS RE SACKLER NEGOTIATIONS	0.40	258.00
03/04/21	JRA	EMAILS WITH A. DELEO AND W. USATINE RE ADVERSARY SCHEDULING AND LOGISTICS	0.40	258.00
03/05/21	JRA	EMAILS WITH W. USATINE AND A. DELEO RE SCHEDULING ORDER	0.30	193.50
03/05/21	ADL	REVIEW AKIN COMMENTS TO NOA; EMAIL CS TEAM RE: SAME	0.30	172.50
03/05/21	ADL	REVIEW NOTICES OF APPEARANCE IN OTHER ADVERSARY PROCEEDINGS	0.30	172.50
03/05/21	LSM	REVIEW ADVERSARY SCHEDULING ORDER AND UPDATE CASE CALENDAR WITH ADVERSARY DEADLINES	0.50	157.50
03/05/21	LSM	REVISE AND REVIEW NOTICE OF APPEARANCE IN ADVERSARY PROCEEDINGS	0.30	94.50
03/05/21	JRA	EMAILS WITH A. DELEO RE APPEARANCE IN AP	0.20	129.00
03/06/21	SMU	REVIEW PRIVILEGE/PRIORITY DOCUMENTS	0.90	571.50
03/07/21	WU	REVIEW AIG COVERAGE LETTER AND CASES	0.30	247.50
03/07/21	SMU	REVIEW PRIVILEGE/PRIORITY DOCUMENTS	0.70	444.50
03/08/21	WU	REVIEW EMAILS RE: SEARCH TERMS	0.10	82.50
03/08/21	LSM	REVISE, FILE AND ORGANIZE SERVICE OF NOTICE APPEARANCE IN ADVERSARY PROCEEDING	0.40	126.00
03/08/21	WU	REVIEW EMAILS AND DOCUMENTS RE: POLICY MATTERS	0.40	330.00
03/08/21	JRA	REVIEW AIG COVERAGE LETTER	0.40	258.00
03/08/21	WU	REVIEW DRAFT COMMON INTEREST AGREEMENT AND EMAILS RE: SAME	0.30	247.50
03/09/21	MXK	REVIEW SEARCH TERM LIST AND RELEVANT EMAILS IN PREPARATION FOR DISCUSSION WITH CO-COUNSEL RE: JURISDICTIONAL DISCOVERY	0.50	215.00
03/10/21	MXK	PREPARE FOR AND PARTICIPATE IN CALL WITH CO-COUNSEL RE: DISCOVERY RELATED TO PERSONAL JURISDICTION, SEARCH TERMS, STRATEGY.	0.80	344.00
03/11/21	MXK	REVIEW AND ANALYZE PROPOSED SEARCH TERMS FOR DISCOVERY INTO PERSONAL JURISDICTION ISSUES	0.30	129.00
03/13/21	JRA	REVIEW REVISED SACKLER TERM SHEET (.2) AND EMAILS WITH A. PREIS RE SAME (.1)	0.30	193.50
03/16/21	WU	REVIEW RULE 26 AND PRO INITIAL DISCLOSURE REQUIREMENTS; REVIEW FORM PRETRIAL ORDER	0.60	495.00
03/16/21	WU	CONFERENCE CALL WITH PLAINTIFFS' COUNSEL RE: 3/24 CONFERENCE	0.50	412.50
03/16/21	WU	REVIEW PLAN DOCUMENTS AND PRESS REPORTS RE: PLAN ISSUES AND TIMING	1.20	990.00
03/17/21	WU	CONTINUED REVIEW OF PLAN /DISCLOSURE STATEMENT DOCUMENTS AND ISSUES RE: INSURANCE LITIGATION	0.70	577.50

Re: OFFICIAL COMMITTEE OF UNSECURED CREDITORS

Client/Matter No. 60810-0001

DATE	<u>INITIALS</u>	<u>Description</u>	HOURS	AMOUNT
03/17/21	WU	REVIEW PROTECTIVE ORDER AND EMAILS RE: SAME	0.40	330.00
03/17/21	WU	REVIEW DRAFT EMAILS TO ADVERSARY COUNSEL AND EMAILS WITH PLAINTIFF GROUP RE: SAME	0.30	247.50
03/17/21	WU	REVIEW AND COMMENT ON PROPOSED SCHEDULING ORDER AND REVIEW AND RESPOND TO MULTIPLE EMAILS RE: SAME	0.50	412.50
03/18/21	MXK	CALL WITH CO-COUNSEL RE: ANALYSIS OF SEARCH TERMS, STRATEGY	0.80	344.00
03/19/21	WU	REVIEW AND RESPOND TO MULTIPLE EMAILS RE: 3/24 CONFERENCE	0.30	247.50
03/19/21	JRM	WORK ON REPORTING FOR UCC'S ANALYSIS OF PLAN TREATMENT.	0.50	327.50
03/19/21	JRA	REVIEW LETTER FROM INSURERS	0.10	64.50
03/20/21	WU	REVIEW AND COMMENT ON MULTIPLE EMAILS AND VERSIONS OF LETTER RE: 3/24 CONFERENCE	0.70	577.50
03/20/21	JRA	EMAILS WITH W. USATINE, A. PREIS AND R. LEVERIDGE RE LETTER RESPONSE TO INSURERS	0.40	258.00
03/21/21	WU	REVIEW AND RESPOND TO MULTIPLE EMAILS RE: CORRESPONDENCE TO COURT AND 3/24 CONFERENCE ISSUES AND STRATEGY	0.40	330.00
03/21/21	JRA	EMAILS WITH P. BREENE AND M. HURLEY RE RESPONSE TO INSURERS LETTER	0.30	193.50
03/22/21	JRA	EMAILS WITH A. DELEO AND W. USATINE RE MOTION TO WITHDRAW REFERENCE	0.30	193.50
03/22/21	ADL	EMAILS RE: PRE-TRIAL CONFERENCE IN INSURANCE ADVERSARY	0.20	115.00
03/22/21	ADL	INITIAL REVIEW OF MOTION TO WITHDRAW THE REFERENCE IN INSURANCE ADVERSARY	1.20	690.00
03/22/21	ADL	RESEARCH RE: RESPONSE DEADLINE FOR MOTION TO WITHDRAW THE REFERENCE IN INSURANCE ADVERSARY (.4); EMAILS WITH CS TEAM RE: SAME (.1)	0.50	287.50
03/22/21	WU	REVIEW CARRIER LETTER TO COURT RE: 3/24 CONFERENCE	0.10	82.50
03/22/21	WU	REVIEW DRAFTS OF LETTER TO COURT AND EMAILS RE: SAME	0.40	330.00
03/22/21	WU	REVIEW AND ANALYSIS OF MOTION TO WITHDRAW THE REFERENCE FILED BY CARRIERS AND SUPPORTING BRIEF	1.10	907.50
03/22/21	JRM	WORK ON REPORTING FOR UCC'S ANALYSIS OF PLAN TREATMENT.	1.30	851.50
03/22/21	MXK	REVIEW LIBERTY MUTUAL'S MOTION TO WITHDRAW REFERENCE OF THE ADVERSARY PROCEEDING	0.50	215.00
03/23/21	ADL	EMAIL CS TEAM RE: MOTION TO WITHDRAW REFERENCE IN INSURANCE ADVERSARY	0.10	57.50
03/23/21	ADL	EMAIL W. USATINE RE: PRETRIAL CONFERENCE IN INSURANCE ADVERSARY	0.10	57.50
03/23/21	JRA	EMAILS WITH A. PREIS AND S. BRAUNER RE INSURANCE ADVERSARY	0.30	193.50

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DATE	<u>INITIALS</u>	<u>Description</u>	HOURS	<u>AMOUNT</u>
03/23/21	MXK	PARTICIPATE IN MEET-AND-CONFER CALL WITH INSURANCE COUNSEL	0.20	86.00
03/23/21	WU	CALL WITH CARRIER'S COUNSEL RE: COURT CONFERENCE	0.20	165.00
03/23/21	WU	EMAILS RE: CALL WITH CARRIERS AND COURT CONFERENCE	0.20	165.00
03/23/21	WU	REVIEW CORRESPONDENCE TO COURT RE: PRETRIAL CONFERENCE AND OUTLINE ISSUES RE: SAME	0.50	412.50
03/23/21	JRA	REVIEW MOTION/BRIEF IN SUPPORT OF WITHDRAWAL OF REFERENCE	0.60	387.00
03/24/21	WU	REVIEW AND RESPOND TO MULTIPLE EMAILS RE: RESCHEDULING OF PRETRIAL CONFERENCE	0.20	165.00
03/24/21	WU	PREPARE FOR AND ATTEND 3/24 CONFERENCE (ADJOURNED BY COURT)	0.90	742.50
03/24/21	ADL	CONTINUE TO REVIEW MOTION TO WITHDRAW THE REFERENCE AS TO INSURANCE ADVERSARY	1.10	632.50
03/24/21	ADL	REVIEW LETTERS RE: PRE-TRIAL CONFERENCE IN INSURANCE ADVERSARY	0.20	115.00
03/24/21	ADL	ADDITIONAL REVIEW OF COMPLAINT IN INSURANCE ADVERSARY	1.20	690.00
03/24/21	WU	CONFERENCE CALL WITH CO-PLAINTIFF'S COUNSEL GROUP RE: PREPARATION FOR 3/24 STATUS CONFERENCE	0.80	660.00
03/24/21	ADL	ATTEND PRETRIAL CONFERENCE IN INSURANCE ADVERSARY	0.50	287.50
03/24/21	LSM	ASSIST WITH HEARING PREPARATIONS FOR MARCH 24, 2021 PRETRIAL CONFERENCE	0.40	126.00
03/24/21	LSM	RESEARCH ADVERSARY CASE DOCKET, COMPILE ALL PRETRIAL LETTERS AND FORWARD SAME TO W. USATINE	0.50	157.50
03/24/21	ADL	EMAIL W. USATINE RE: PRETRIAL CONFERENCE IN INSURANCE ADVERSARY	0.20	115.00
03/24/21	JRA	EMAILS WITH W. USATINE, A. PREIS AND R. LEVERIDGE RE MEET AND CONFER	0.40	258.00
03/24/21	MXK	ATTEND TELEPHONIC COURT HEARING	0.50	215.00
03/24/21	MXK	CALL WITH CO-COUNSEL RE: PREPARATION FOR COURT HEARING	0.80	344.00
03/25/21	LSM	REVIEW NOTICE OF ADJOURNED PRETRIAL CONFERENCE TO APRIL 6TH	0.10	31.50
03/25/21	JRM	WORK ON REPORTING FOR SACKLER INVESTIGATION AND QC REVIEW.	1.60	1,048.00
03/29/21	LSM	UPDATE BANKRUPTCY CASE CALENDAR WITH ADJOURNED PRETRIAL CONFERENCE FOR APRIL 6TH	0.20	63.00
03/29/21	ADL	REVIEW NOTICE OF ADJOURNMENT OF PRETRIAL CONFERENCE	0.10	57.50
03/31/21	WU	REVIEW SEVERAL EMAILS/CORRESPONDENCE RE: SERVICE ISSUES AND BRIEFING SCHEDULE	0.30	247.50
03/31/21	MXK	REVIEW CORRESPONDENCE BETWEEN CO-COUNSEL RE: INSURANCE PARTIES; CALL WITH CO-COUNSEL RE: SAME.	0.50	215.00

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DATE	<u>INITIALS</u>	<u>Description</u>	HOURS	<u>AMOUNT</u>
03/31/21	JRA	EMAILS WITH P. BREENE AND J. HUDSON RE XL LETTER	0.20	129.00
PREPARA	TION FOR AN	D ATTENDANCE AT HEARINGS	2.50	1,447.50
<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	HOURS	<u>AMOUNT</u>
03/04/21	LSM	REVISE NOTICE OF APPEARANCE PER A. DE LEO COMMENTS AND FORWARD SAME TO A. DE LEO	0.50	157.50
03/09/21	JRA	EMAILS WITH A. DELEO, S. USATINE AND A. PREIS RE TOMORROW'S HEARING	0.40	258.00
03/19/21	JRA	EMAILS WITH W. USATINE AND A. DELEO RE 3/24 STATUS CONFERENCE	0.20	129.00
03/22/21	JRA	EMAILS WITH W. USATINE RE STATUS CONFERENCE	0.10	64.50
03/23/21	JRA	EMAILS WITH W. USATINE, R. SHORE, P. BREENE AND R> LEVERIDGE RE STATUS CONFERENCE	0.50	322.50
03/23/21	JRA	EMAILS WITH A. PREIS RE MEET AND CONFER AND TOMORROW'S HEARING	0.20	129.00
03/24/21	JRA	EMAILS WITH A. PREIS AND W. USATINE RE TODAY'S HEARING	0.20	129.00
03/25/21	JRA	EMAILS WITH A. PREIS RE YESTERDAY'S HEARING	0.20	129.00
03/25/21	JRA	EMAILS WITH W. USATINE AND P. BREENE RE HEARING ADJOURNMENT	0.20	129.00
REORGAN	IIZATION PLA	N	0.70	449.50
<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	HOURS	<u>AMOUNT</u>
03/04/21	PJR	REVIEW AND ANALYZE DRAFT REVISED PLAN	0.40	256.00
03/19/21	JRA	EMAILS WITH A. PREIS RE PLAN OPEN ISSUES	0.30	193.50
		TOTAL HOURS	105.20	
PROFESSIO	NAL SERVICES	:		\$55,160.50

TIMEKEEPER SUMMARY

Re:

<u>NAME</u>	TIMEKEEPER TITLE	HOURS	<u>RATE</u>	AMOUNT
Alberto, Justin	Member	14.40	645.00	9,288.00
Anastasia Bellisari	Paralegal	6.20	280.00	1,736.00
DeLeo, Anthony	Associate	6.60	575.00	3,795.00
Donald A. Ottaunick	Member	0.60	735.00	441.00
Jason R. Melzer	Member	6.30	655.00	4,126.50
Lauren M. Manduke	Member	18.20	520.00	9,464.00
Michael C. Klauder	Member	4.90	430.00	2,107.00
Morton, Larry	Paralegal	27.20	315.00	8,568.00
Patrick J. Reilley	Member	6.60	640.00	4,224.00

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<u>NAME</u>	TIMEKEEPER TITLE	HOURS	<u>RATE</u>	AMOUNT
Susan Usatine	Member	1.60	635.00	1,016.00
Warren Usatine	Member	12.60	825.00	10,395.00
	Total	105.20		\$55,160.50

EXHIBIT D

EXPENSE SUMMARY MARCH 1, 2021 THROUGH MARCH 31, 2021

Expense Category	Service Provider	Total Expenses
	(if applicable)	_
Online Research	WestLaw	\$17.75
Conference Call	Court Solutions	\$140.00
TOTAL		\$157.75

EXHIBIT E

Expense Detail

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COST DETAIL

<u>DATE</u>	<u>Description</u>	QUANTITY	AMOUNT
09/16/20	ONLINE RESEARCH	1.00	9.25
02/04/21	ONLINE RESEARCH	2.00	0.20
02/04/21	ONLINE RESEARCH	4.00	0.40
02/10/21	ONLINE RESEARCH	1.00	0.10
02/10/21	ONLINE RESEARCH	14.00	1.40
02/10/21	ONLINE RESEARCH	1.00	0.10
02/10/21	ONLINE RESEARCH	17.00	1.70
02/10/21	ONLINE RESEARCH	2.00	0.20
02/10/21	ONLINE RESEARCH	30.00	3.00
02/10/21	ONLINE RESEARCH	14.00	1.40
03/24/21	CONFERENCE CALL	1.00	70.00
03/24/21	CONFERENCE CALL	1.00	70.00
		Total	\$157.75

TOTAL SERVICES AND COSTS:

\$ 55,318.25